

1 MALCOLM A. HEINICKE (SBN 194174)
2 AILSA W. CHANG (SBN 217917)
3 MUNGER, TOLLES & OLSON LLP
4 560 Mission Street
5 Twenty-Seventh Floor
San Francisco, CA 94105-2907
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
E-Mail: Malcolm.Heinicke@mto.com

6 JAY COHEN (admitted *pro hac vice*)
7 DANIEL J. TOAL (admitted *pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
1285 Avenue of the Americas
8 New York, New York 10019
Telephone: (212) 373-3000
9 Facsimile: (212) 373-2399
E-Mail: jaycohen@paulweiss.com

10 Attorneys for Defendant
11 CITIGROUP GLOBAL MARKETS, INC., D/B/A SMITH
BARNEY

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

16 RENEE FASSBENDER AMOCHAEV, et
17 al..

18 Plaintiff,

19 vs.

20 CITIGROUP GLOBAL MARKETS, INC.,
d/b/a SMITH BARNEY,

21 Defendant.

CASE NO. C 05-1298 PJH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND PLAINTIFFS' TIME
TO RESPOND TO DEFENDANT'S
MOTION TO TRANSFER AND
CONSOLIDATE HEARING ON MOTION
WITH CASE MANAGEMENT
CONFERENCE**

22 Current Hearing Date: July 20, 2005 (9:00 am)
Proposed Date: Sept. 14, 2005 (9:00 am)

23
24 The Honorable Phyllis Jean Hamilton

1 WHEREAS, Defendant filed a Motion to Transfer Pursuant to 28 U.S.C. § 1404(a)
2 on June 10, 2005 (the “Transfer Motion”); and

3 WHEREAS, Defendant noticed a hearing on the Transfer Motion for July 20,
4 2005; and

5 WHEREAS, at the request of the Plaintiffs, the parties have agreed to an extension
6 of the dates for the filing of opposition and reply papers to the Transfer Motion, and they have
7 agreed to an associated continuance of the originally noticed hearing date; and

8 WHEREAS, the parties previously requested and this Court granted a continuance
9 of the Case Management Conference to September 15, 2005; and

10 WHEREAS, counsel for both parties may be traveling from out of state to attend
11 the hearing on the transfer motion and the previously-scheduled Case Management Conference,
12 and therefore respectfully request that in the interest of judicial efficiency and preservation of
13 resources, the Court hold the Case Management Conference on September 14, 2005 together with
14 the hearing on the Transfer Motion; and

15 WHEREAS, the parties through their counsel of record stipulate to an order as
16 follows:

17 ///

18 ///

19 ///

20

21

22

23

24

25

26

27

28

1 Plaintiffs' Opposition to Defendant's Motion to Transfer shall be due on July 29,
2 2005; Defendant's Reply shall be due on September 2, 2005; and both the hearing on the Transfer
3 Motion and the Case Management Conference shall be held on Wednesday, September 14, 2005,
4 at 9:00 a.m. Other than as set forth in this Order, the Local Rules of Court and other pertinent
5 rules shall govern the pleadings filed in connection with the Motion to Transfer.

6

7 DATED: June 29, 2005

LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP

8

9 By: 
10 KELLY M. DERMODY

11

12 Attorneys for Plaintiffs
RENEE FASSBENDER AMOCHAEV,
DEBORAH ORLANDO, KATHRYN N.
VARNER AND JUDY WEIL

13

14 DATED: June _____, 2005

MUNGER, TOLLES & OLSON LLP

15

16

By: 
17 MALCOLM A. HEINICKE

18

19

Attorneys for Defendant
CITIGROUP GLOBAL MARKETS, INC.,
D/B/A SMITH BARNEY

20

21

PURSUANT TO STIPULATION, IT IS SO ORDERED

22

Dated: 7/1/05


23 HONORABLE PHYLLIS JEAN HAMILTON
24 UNITED STATES DISTRICT JUDGE

25

26

27

28

1108520.1

- 3 -

STIP. TO CONTINUE HEARING DATE
AND CONSOLIDATE CMC. C 05-1298 PJH

1 Plaintiffs' Opposition to Defendant's Motion to Transfer shall be due on July 29,
2 2005; Defendant's Reply shall be due on September 2, 2005; and both the hearing on the Transfer
3 Motion and the Case Management Conference shall be held on Wednesday, September 14, 2005,
4 at 9:00 a.m. Other than as set forth in this Order, the Local Rules of Court and other pertinent
5 rules shall govern the pleadings filed in connection with the Motion to Transfer.

6

7 DATED: June _____, 2005

LIEFF, CABRASER, HEIMANN &
8 BERNSTEIN, LLP

9

10

By: _____
KELLY M. DERMODY

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

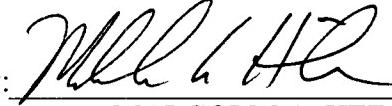
27

28

Attorneys for Plaintiffs
RENEE FASSBENDER AMOCHAEV,
DEBORAH ORLANDO, KATHRYN N.
VARNER AND JUDY WEIL

DATED: June 30, 2005

MUNGER, TOLLES & OLSON LLP

By: 
MALCOLM A. HEINICKE

Attorneys for Defendant
CITIGROUP GLOBAL MARKETS, INC.,
D/B/A SMITH BARNEY

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

HONORABLE PHYLLIS JEAN HAMILTON
UNITED STATES DISTRICT JUDGE